

**Multnomah County SEC-h, SEC-v, SEC-sv
Natural Resources Assessment**

17645 NW St. Helens Road

Multnomah County/ Portland, Oregon

(Township 2 North, Range 1 West, Section 18D, Tax Lot 500)

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1.0 INTRODUCTION

Pacific Habitat Services, Inc. (PHS) conducted a natural resources assessment for a rural residential property located at 17645 NW St. Helens Road (Township 2 North, Range 1 West, Section 18D, Tax Lot 500). The location of the study area is illustrated in Figures 1-3 (all Figures are in Appendix A).

The entirety of the 11.0-acre property is designated as Significant Environmental Concern-wildlife habitat (SEC-h) by Multnomah County, as well as a 5.6-acres (246,175 square feet) of Significant Environmental Concern-stream (SEC-s) along the northwest boundary, and a portion of Significant Environmental Concern – scenic view (SEC-sv) near the north portion of the site (Figure 2). Impacts to the SEC-h and SEC-s areas will be addressed in the narrative response and in the Stream Conservation Plan (Appendix C).

The existing development, which includes an approximately 60-foot driveway leading from NW St. Helens Road, consists of a two-story residential treatment center with a 22,459 square foot (sf) footprint, as well as a 30,760 sf parking lot, a 1,400 sf garden, a 100 sf detached sweat lodge, a 3,424 sf unpaved walking path, 24,339 sf of septic drain field, and a 4,785 sf area containing septic facilities (Figure 4). The proposed project includes complete removal of the existing treatment center, parking lots, and driveways, followed by the construction of a new three-story treatment center with a 22,062-sf footprint, 39,440-sf of paved parking lot, sidewalk, and driveway, 4,813-sf of pervious paved walking path, and a 1,119-sf rubber playground surface. Since Multnomah County has designated the entire 11-acre site as a significant wildlife resource, and approximately 6.73 acres (293,197 sf) of the site as a significant stream resource, a resource assessment is required. This report evaluates wildlife habitat and stream conditions and provides mitigation to offset site impacts to these natural resources.

2.0 WILDLIFE HABITAT ASSESSMENT

Multnomah County mapped the entire site as a resource of Significant Environmental Concern including significant wildlife habitat (SEC-h).

2.1 Purpose

The purpose of this assessment was to identify the presence of significant wildlife resources on the project site and describe the potential impacts the proposed development may have on these resources. To achieve this objective, the assessment involved an examination of the criteria set forth in the Multnomah County Community Development Code for Significant Environmental Concerns, specifically addressing Wildlife Habitat (MCC §39.5540).

2.2 Methods

Before commencing field work, a review was conducted using Multnomah County Significant Environmental Concern natural resource maps, U.S. Geological Survey (USGS) topographic maps, National Wetland Inventory (NWI) maps, and aerial photographs to ascertain the extent and type of natural resources mapped in the vicinity of the project area.

A wildlife habitat assessment was conducted on November 7, 2024, to evaluate site conditions, vegetation composition and structure, evidence of wildlife utilization, and other notable features. Descriptions of observed habitats and wildlife usage are included below.

2.3 Discussion

2.3.1 Habitat Description

The site is located at 17645 NW St. Helens, and is an 11-acre parcel located entirely within tax lot 500. The existing development, which includes an approximately 60-foot driveway leading from NW St. Helens Road, consists of a two-story residential treatment center with a 22,459 square foot (sf) footprint, as well as a 30,760 sf parking lot, a 100 sf detached sweat lodge, a 1,400 sf garden, a 3,424 sf unpaved walking path, 24,339 sf of septic drain field, and a 4,785 sf area containing septic facilities (Figure 4). The building is surrounded by several scattered native trees including Douglas fir (*Pseudotsuga menziesii*), western redcedar (*Thuja plicata*), red alder (*Alnus rubra*) black cottonwood (*Populus trichocarpa*) and big leaf maple (*Acer macrophyllum*), as well as several non-native and ornamental trees. Trees near the existing building do not meet the standards outlined in MCC §39.5860(A)(1) for forested areas. Within the northwest and southern boundaries of the subject parcel, trees present do meet these standards and are considered “forested” areas. Within these areas, groundcover is dominated by Himalayan blackberry (*Rubus armeniacus*), reed canarygrass (*Phalaris arundinacea*), water parsley (*Oenanthe sarmentosa*), and lady fern (*Athyrium filix-femina*). Within the unforested areas, including those around the existing building, groundcover is dominated by non-native turf grass.

The topography of the site generally slopes from southeast to northwest, with much of the existing development located within area that has been previously graded. Elevations range from approximately 490-535 feet with the peak located on the southeast boundary near the boundary with adjacent tax lot 600. There are two wetland areas delineated on site; one that lays south of the existing building area, and another that is located along the western area of the subject parcel, connected to McCarthy Creek. Figure 4 shows the existing conditions of the property and location of photo points; Appendix B contains photos of the site.

2.3.2 Wildlife

Wildlife Habitat

Wildlife habitat includes mixed coniferous-deciduous woodland, mature palustrine forested wetland, riparian areas surrounding McCarthy Creek, and open turf grass areas. These habitats are generally not managed, save for the turf grass areas that are consistently mowed. Where McCarthy Creek is located below top of bank was found to be in “Good” condition. This riparian area, as well as the palustrine forested wetland area provides high value habitat for mammals, terrestrial and aquatic invertebrates, birds, amphibians, and fish. Elsewhere on site, conditions are lower in value. The turf grass area is considered “Degraded” and may provide some forage for birds and larger mammals but does not provide much in the way of habitat or cover for any wildlife.

Wildlife Corridor

The site is bordered to the north by two highly trafficked roadways: NW St. Helens Road and NW Cornelius Pass Road. To the west, the site is bordered by habitat similar to that which is on site, forested uplands and stream corridors, which likely provide excellent access to the subject parcel by most wildlife. While the southern area of the subject parcel may serve as a high-quality corridor to the west hills, wildlife intending on safely crossing to the north to adjacent habitat is mostly restricted to a small area below where NW St. Helens Road crosses McCarthy Creek. If not crossing through this area, wildlife must pass over NW St. Helens Road.

Within the site, the heterogenous structure provides useful wildlife corridors for small mammals, reptiles, and amphibians, as they provide cover, food sources, and serve as wildlife corridors and dispersal routes for a variety of species even in the presence of a major transportation corridor and rural residential development.

Wildlife Species Observed and Expected

Wildlife expected to be observed includes songbirds and birds of prey, as well as direct or indirect observations of deer, coyotes, and other small mammals. During the site visit, a small number of birds were detected via song and visual observation along the southern boundary of the parcel, adjacent to the grass field. Deer tracks were also observed. It is likely that a larger number and diversity of animals would be observed had field work been conducted in spring, when animals are more likely to be active. The birds observed on site are listed in the table below.

Table 1. Birds Observed on Site

Latin Name	Common Name
<i>Corvus brachyrhynchos</i>	American crow
<i>Pipilo maculatus</i>	Spotted towhee
<i>Haemorhous purpureus</i>	purple finch
<i>Junco hyemalis</i>	dark-eyed junco
<i>Turdus migratorius</i>	American robin

3.0 STREAM CORRIDOR ASSESSMENT

The site contains a portion of McCarthy Creek, which Multnomah County has mapped as an area of Significant Environmental Concern – Stream (SEC-s).

3.1 Purpose

The purpose of this assessment was to identify the presence of significant stream resources on the project site and describe the potential impacts the proposed development may have on these resources. To achieve this objective, the assessment involved an examination of the criteria set forth in the Multnomah County Community Development Code for Significant Environmental Concerns, specifically addressing Stream Habitat (MCC §39.5590).

3.2 Methods

Before commencing field work, a review was conducted using Multnomah County Significant Environmental Concern natural resource maps, U.S. Geological Survey (USGS) topographic maps, National Wetland Inventory (NWI) maps, and aerial photographs to ascertain the extent and type of natural resources mapped in the vicinity of the project area. A wildlife habitat assessment was conducted on November 7, 2024, to evaluate site conditions, vegetation composition and structure, evidence of wildlife utilization, and other notable features. Descriptions of observed habitats and wildlife usage are included below.

3.3 Discussion

3.3.1 Habitat Description

Existing Conditions

During a site visit and wetland delineation on November 7, 2024, the stream conservation area condition was assessed and documented. The area was determined to have three distinct vegetated corridors.

Vegetated corridor (VC) A (150,700 sf) lays within the area below the top of bank of the stream resource and is considered “Good” due to the native tree canopy that exceeds 50% and approximately 80% overall cover of native trees, shrubs, and groundcover. Areas of non-native or nuisance vegetation within this area consist primarily of small areas of Himalayan blackberry and reed canarygrass adjacent to the banks of the stream resource. Dominant native trees include big leaf maple, red alder, and pacific willow (*Salix lasiandra*); with the shrub and herbaceous stratum dominated by sitka willow (*Salix sitchensis*), pacific ninebark (*Physocarpus capitatus*), beaked hazel (*Corylus cornuta*), and cattail (*Typha latifolia*). No impact or mitigation is VC A

VC B (14,523 sf) is considered “Marginal” and includes two areas within the SEC-s overlay where the native tree canopy consists primarily of mature big leaf maple (*Acer macrophyllum*) and cottonwood (*Populus balsamifera*) with approximately 70% canopy cover, as well as an understory dominated by Himalayan blackberry (*Rubus armeniacus*). No development or impacts are proposed within these areas, aside from use as mitigation area. See Stream Conservation Plan for additional details.

VC C (107,317) is considered “Degraded” and lays within area above top of bank, where temporary and permanent impacts are proposed. This area currently contains a paved parking lot and building access area, a septic drain field, septic equipment area, an unpaved walking trail, managed turf, and a transmission line corridor. It is considered “Degraded” due to the tree canopy that falls below 25% and high cover of non-native turf grasses. All construction within the stream conservation overlay will be within VC C. No area of VC C is suitable for mitigation due to current uses that are not compatible with mitigation.

A small area of wetland was delineated during the November 2023 site visit, located near the south side of the medical facilities, as well as an additional larger wetland area observed at the SE corner of the parcel. No impacts are proposed to any wetlands on site. See Figures 3 and 4 for relative locations of the wetlands, as well as McCarthy Creek and Vegetation Corridor Plant Communities.

4.0 SEC APPROVAL CRITERIA

§ 39.5530 SEC Permit Criteria (Significant Environmental Concern)

The SEC designation shall apply to those significant natural resources, natural areas, wilderness areas, cultural areas, and wild and scenic waterways that are designated SEC on Multnomah County Zoning Map. Any proposed activity or use requiring an SEC permit shall be subject to the following:

(A) Decision Review Process

- (1) Applications shall meet all of the criteria in MCC 39.5530 (B) through (C) and shall be processed through the Type II review procedure.**
 - (a) Properties designated with the SEC Overlay along the Sandy River in the East of Sandy River rural area, shall be subject to the approval criteria listed in MCC 39.5560 in lieu of the approval criteria in MCC 39.5530(C) below.**

RESPONSE: The subject parcel is not located within the SEC overlay along the Sandy River and is thereby subject to the standards of MCC §39.5530 (B) through (C).

(B) Application Submittal Requirements. All applications for an SEC permit shall include the following:

- (1) A written description of the proposed development and how it complies with the applicable approval criteria of MCC 39.5530(C) below.**
- (2) A scaled site plan of the property showing:**
 - (a) Property lines;**
 - (b) Location and size of all existing and proposed buildings and structures;**
 - (c) Contour lines and topographic features such as ravines or ridges (contour lines no greater than 10 feet);**
 - (d) Boundaries of ground disturbing activities, including proposed fill, excavating, site contouring or other landform changes;**
 - (e) Location and predominant species of existing vegetation on the parcel (wooded areas), areas where vegetation will be removed, and location and species of vegetation to be planted, including landscaped areas;**
 - (f) Location and width of existing and proposed roads, driveways, and service corridors; (g) Location of natural drainageways, springs, seeps, water bodies and wetlands on the site;**
 - (h) Location of wells, utility lines, stormwater drainage control system, sanitary tanks and drainfields (primary and reserve);**
 - (i) A scaled drawing of the building design and elevations that show the relationship between the building and existing and finished grades, and existing or proposed vegetation.**
- (3) The Planning Director may also require the applicant to provide additional information, beyond that listed in this section such as a report prepared by an appropriate subject matter expert, where needed to address relevant approval criteria.**

RESPONSE: These criteria are met; the submittal contains all items listed in (B)(1) and (2). The planning director has not requested additional information at this time.

(C) SEC Permit Approval Criteria

The SEC designation shall apply to those significant natural resources, natural areas, wilderness areas, and cultural areas that are designated SEC on the Multnomah County Zoning Map. Any proposed development, activity or use requiring an SEC permit shall meet/comply with the following:

- (1) The maximum possible landscaped area, scenic and aesthetic enhancement, open space or vegetation shall be provided between any use and a river, stream, lake, or floodwater storage area.*
- (2) Agricultural land and forest land shall be preserved and maintained for farm and forest use.*
- (3) A building, structure, or use shall be located on a lot in a manner which will balance functional considerations and costs with the need to preserve and protect areas of environmental significance.*
- (4) Significant fish and wildlife habitats shall be protected.*
- (5) The natural vegetation along rivers, lakes, wetlands and streams shall be protected and enhanced to the maximum extent practicable to assure scenic quality and protection from erosion, and continuous riparian corridors.*
- (6) Archaeological areas shall be preserved for their historic, scientific, and cultural value and protected from vandalism or unauthorized entry.*
- (7) Areas of annual flooding, floodplains, water areas, and wetlands shall be retained in their natural state to the maximum possible extent to preserve water quality and protect water retention, overflow, and natural functions.*
- (8) Areas of erosion or potential erosion shall be protected from loss by appropriate means. Appropriate means shall be based on current Best Management Practices and may include restriction on timing of soil disturbing activities.*
- (9) The quality of the air, water, and land resources and ambient noise levels in areas classified SEC shall be preserved in the development and use of such areas.*
- (10) The design, bulk, construction materials, color and lighting of buildings, structures and signs shall be compatible with the character and visual quality of areas of significant environmental concern.*
- (11) An area generally recognized as fragile or endangered plant habitat or which is valued for specific vegetative features, or which has an identified need for protection of the natural vegetation, shall be retained in a natural state to the maximum extent possible.*
- (12) The applicable policies of the Comprehensive Plan shall be satisfied.*

RESPONSE: When applicable, the submittal complies with all criteria listed above.

§ 39.5540 SEC-h PERMIT CRITERIA (SIGNIFICANT WILDLIFE HABITATS)

Since the entire property is located within the SEC-h overlay, an SEC-h permit is required. If development standards in MCC §39.5860(C) cannot be met, a Wildlife Conservation Plan will be required. Each applicable section of the code is discussed below.

(A) Decision Review Process

- (1) Applications that meet all of the criteria in MCC 39.5540(C) below, shall be processed through the Type I review procedure. A mitigation plan pursuant to subsection (D) below is not required.*
- (2) Applications that do not meet all of the criteria in MCC 39.5540(C) below, shall be processed through the Type II review procedure. A mitigation plan pursuant to subsection (D) below is required.*

RESPONSE: All criteria outlined in MCC §39.5540(C) are met; therefore, the application shall be processed through the Type I review procedure.

(B) Application Submittal Requirements. All applications for an SEC-h permit shall include the following:

- (1) A written description of the proposed development and how it complies with the applicable approval criteria of MCC 39.5540 (C) and (D).*
- (2) A scaled site plan of the property showing:*
 - (a) Property lines;*

- (b) *Location and size of all existing and proposed structures; and all existing and proposed type and location of fencing on the subject property and on adjacent properties and on properties entirely or partially within 200 feet of the subject property;*
 - (c) *Contour lines and topographic features such as ravines or ridges (contour lines not greater than 10 feet);*
 - (d) *Boundaries of ground disturbing activities, including proposed fill, excavating, site contouring or other landform changes;*
 - (e) *Location and predominant species of existing vegetation on the parcel (wooded areas), areas where vegetation will be removed, and location and species of vegetation to be planted, including landscaped areas;*
 - (f) *Location and width of existing and proposed public roads, private access roads, driveways, and service corridors on the subject parcel and within 200 feet of the subject parcel's boundaries on all adjacent parcels;*
 - (g) *Location of all existing forested areas (including areas cleared pursuant to an approved forest management plan) and non-forested "cleared" areas; For the purposes of this section, a forested area is defined as an area that has at least 75 percent crown closure, or 80 square feet of basal area per acre, of trees 11 inches DBH and larger, or an area which is being reforested pursuant to Forest Practice Rules of the Department of Forestry. A non-forested "cleared" area is defined as an area which does not meet the description of a forested area and which is not being reforested pursuant to a forest management plan.*
 - (h) *Location of wells, utility lines, stormwater drainage control systems, sanitary tanks and drainfields (primary and reserve);*
 - (i) *A sealed drawing of the building design and elevations that show the relationship between the building and existing and finished grades and existing or proposed vegetation.*
- (3) *The Planning Director may also require the applicant to provide additional information, beyond that listed in this section such as a report prepared by an appropriate subject matter expert, where needed to address relevant approval criteria*

RESPONSE: These criteria are met; the submittal contains all items listed in (B)(1) and (2). Figure 1 shows general location and topography of the area surrounding the proposed facilities as outlined in criterion (c). Figure 2 shows the location of the SEC overlays within and surrounding the subject parcel, including the criterion (a). Figure 3 shows the general area of the proposed facilities. Figure 4 contains the items required by criteria (a), (b), (e), (g), and (h). The planning director has not requested additional information at this time.

(C) SEC-h Permit Approval Criteria

(1) Development Standards

- (a) *Where a parcel contains any non-forested "cleared" areas within 200 feet of a public road, development shall only occur in these areas, except as necessary to provide access and to meet minimum clearance standards for fire safety.*

RESPONSE: This criterion is met; all development shall occur within existing "cleared" areas with 200 feet of NW St. Helens Road (Figure 4).

- (b) *Development shall occur within 200 feet of a public road capable of providing reasonable practical access to the developable portion of the site.*

RESPONSE: The criterion is met; NW St. Helens Road is located approximately 39 feet from the proposed development (Figure 4).

- (c) *The access road/driveway and service corridor serving the development shall not exceed 500 feet in length.*

RESPONSE: The criterion is met; the length of the driveway to the end of the hammerhead fire truck turnaround is 455 feet, falling within the 500-foot maximum.

- (d) *The development shall be within 300 feet of a side property line if adjacent property has structures and developed areas within 200 feet of that common side property line.*

RESPONSE: This criterion is met; the proposed development is approximately 220 feet from the nearest side property line containing structures/development in tax lot 401. This lot is northeast of NW St. Helens Road and contains a structure approximately 34 feet from the boundary edge. Refer to Figure 3 for location of tax lot 401 relative to the subject parcel.

- (e) *Nuisance and invasive nonnative plants, as defined in MCC 39.5540 shall not be planted on the subject property and shall be removed and kept removed from cleared areas of the subject property.*

RESPONSE: This criterion is met; nuisance plants from the table indicated shall not be planted on the subject parcel. The proposed development will not require clearing of forested areas. See Figure 4 for the location of current forested areas and Figure 5 for location of the proposed development.

- (f) *Ground disturbing activity within 100 feet of a water body as defined by MC 39.2000 shall be limited to the period between May 1st and September 15th. Revegetation and soil stabilization must be accomplished no later than October 15th.*

RESPONSE: This criterion is met; no ground disturbing activities are proposed within 100 feet of McCarthy Creek within the period of May 1st and September 15th.

- (g) *Outdoor lighting shall be of a hooded fixture type and shall be placed in a location so that it does not shine directly into undeveloped habitat areas. Where illumination of habitat area is unavoidable, it shall be minimized through use of limited lumens with a hooded fixture type and proper placement. The location and illumination area of lighting needed for security of public utility facilities shall not be limited by this provision but should be done in a minimalistic manner.*

RESPONSE: This criterion is met; all outdoor lighting shall comply with the above description.

(D) Mitigation Plan Criteria

- (1) *Mitigation Plan Requirements. An applicant shall propose a mitigation plan that provides mitigation activities and plantings as outlined in subsection (2) or (3) below. The mitigation area shall first be located within any existing non-forested, "cleared" areas contiguous to forested areas, second within any degraded stream riparian areas and last in forested areas or adjacent to landscaped yards.*

RESPONSE: The applicant is proposing a design plan that meets all criteria of section (C) and will therefore be processed as a Type I procedure without a mitigation plan pursuant to subsection (D)(2) or (3) below.

- (2) *Addition to Lawfully Established Buildings/Structures: The applicant may utilize the following mitigation measures for additions to lawfully established buildings and structures instead of mitigation plan:*

RESPONSE: This criterion is not applicable; the proposed development is not considered an addition.

- (3) *New Buildings, Structures, and Development: The mitigation plan must demonstrate the following:*

- (a) *That measures are included in order to reduce impacts to forested areas to the minimum necessary to serve the proposed development by restricting the amount of clearance and length/width of cleared areas and disturbing the least amount of forest canopy cover.*

- (b) *That any newly cleared area associated with the development is not greater than one acre, excluding from this total the minimum area required for fire accessway purposes.*
- (c) *That no fencing will be built and existing fencing will be removed outside of areas cleared for the site development except for existing cleared areas used for agricultural purposes.*
- (d) *Mitigation areas:*
 - (i) *All trees, shrubs and ground cover shall be native plants selected from the Metro Native Plant List;*
 - (ii) *Native trees and shrubs shall be planted at a rate of one (1) tree and one (1) shrub for every 100 square feet of development/disturbance area. Bare ground shall be planted or seeded with perennial native greases or herbs.*
 - (iii) *All vegetation shall be planted within the mitigation area located on the same Lot of Record as the development and shall be located within the SECh Overlay or in an area contiguous to the SEC-h Overlay.*
 - 1. *If the vegetation is planted in an area contiguous to the SEC-h Overlay, then the applicant shall preserve the contiguous area by executing a deed restriction, through a restrictive covenant.*
- (e) *The native soils disturbed during development will be conserved on the property.*
- (f) *Plant size. Mitigation trees shall be at least one-half inch in caliper, measured at 6 inches above the ground level for field grown trees or above the soil line for container grown trees (the one-half inch minimum size may be an average caliper measure, recognizing that trees are not uniformly round).*
 - (i) *If using oak or madrone trees, the planting size may be on gallon. Shrubs shall be in at least a 1-quart container or the equivalent in ball and burlap and shall be at least 6 inches in height.*
- (g) *Plant spacing. Trees shall be planted between 8 and 12 feet on center and shrubs shall be planted between 4 and 5 feet on-center, or clustered in single species groups of no more than four (4) plants, with each cluster planted between 8 and 10 feet on-center.*
 - (i) *When planting near existing trees, the drip line of the existing tree shall be the starting point for plant spacing measurements.*
- (h) *Plant diversity. Shrubs shall consist of at least two (2) different species. If 10 trees or more are planted, then no more than 50% of the trees may be of the same genus.*

RESPONSE: These criteria are not applicable; the proposed will be processed as a Type I procedure and will not require a mitigation plan or Wildlife Conservation Plan.

(E) Required Conditions of Approval for all SEC-h Permits

- (1) *An erosion and sediment control plan shall be prepared in compliance with the ground disturbing activity standards set forth in MCC 39.6200 through MCC 39.6235.*

RESPONSE: This criterion is met; an erosion and sediment control plan (ESCP) meeting the criteria outlined in MCC §39.6200 through MCC §39.6235 shall be utilized. Please refer to the Erosion and Sediment Control Permit Code Narrative contained within the land use application.

- (2) *Prior to development, all work areas shall be flagged, fenced, or otherwise marked to reduce potential damage to habitat outside of the work area. The work area shall remain marked through all phases of development.*

RESPONSE: This criterion shall be met; the site shall be flagged or marked as needed to protect areas outside of the work and staging areas and shall remain in place until construction is completed.

- (3) *Trees shall not be used as anchors for stabilizing construction equipment.*

RESPONSE: This criterion shall be met; no trees shall be utilized for stabilization or anchoring.

- (4) *The planting date for the mitigation area shall occur within one year following the approval of the application.*

RESPONSE: This criterion shall be met; planting of any areas to be mitigated shall occur within the first period of October-March following approval of the application, when applicable.

- (5) *Any nuisance and invasive nonnative plants, as defined in MCC 39.5520 shall be removed within the mitigation area prior to planting.*

RESPONSE: This criterion is not applicable; the proposed development meets the criterion outlined in MCC §39.5540(C) and therefore, the application shall be processed through the Type I review procedure and does not require mitigation. Regardless, nuisance vegetation will be removed from areas being disturbed.

- (6) *Monitoring and reporting. Monitoring of the mitigation site is the ongoing responsibility of the property owner. A Yearly Report shall be provided to Multnomah County Land Use Planning for a period of five years, unless the Planning Director requires a longer reporting period.*
- (a) *Plants that die shall be replaced in kind so that a minimum of 80% of the trees and shrubs planted shall remain alive on the fifth anniversary of the date that the migration planting is completed.*
- (b) *Mitigation plantings shall be maintained and shall not be removed from the property without contacting Multnomah County Land Use Planning and receiving written approval to amend the Mitigation Plan.*

RESPONSE: This criterion is not applicable; as the proposed development meets all applicable criteria of MCC §39.5540(C), no mitigation or subsequent monitoring is required.

§ 39.5550 SEC-s Permit Criteria (Significant Streams)

An application for an SEC-s permit shall meet the requirements and approval criteria listed in MCC §39.5590.

§ 39.5590- SEC-wr Permit Criteria (Significant -Water Resources)

(A) *Decision Review Process.*

- (1) *Applications that meet all of the following criteria shall be processed through the Type I review procedure:*

- (a) *The proposed development is located at least 100 feet from the top bank of the Protected Water Feature; and*
- (b) *The application includes a mitigation plan meeting the requirements of MCC 39.5590 (D) that enhances the entire 25 feet in depth closest to the Protected Water Feature for the length of the property, to “Good Corridor” condition as defined in MCC 39.5590 (D).*

- (2) *Applications that do not meet all of the criteria in MCC 39.5590(A)(1) shall be processed through the Type II review procedure. The applicant shall meet all of the criteria in MCC 39.5590 (B) through (E) below.*

RESPONSE: The proposed development includes paving of the existing unpaved walking trail that falls within 100 feet of the top back of McCarthy Creek. As a result, the applicant does not meet subsection (1), and the application must be processed through a Type II review process. The replacement of an existing stormwater line and outfall falls within the top of bank but is considered exempt as per MCC §39.5515 (A)(2)(b), which states that “maintenance and repair of existing flood control facilities” is exempt from all SEC requirements.

“Top of bank”?

How certain are we of this?
I wouldn't normally think an
Outfall was “flood control

A mitigation plan meeting the requirements of 39.5590 (D) is included in Appendix C. The criteria of MCC §39.5590 (B) through (E) are discussed below.

(B) Application Submittal Requirements. *All applicants for an SEC-wr or SEC-s permit shall include the following:*

(1) *A written description of the proposed development and how it complies with the applicable approval criteria of subsection (C) and (E) below.*

RESPONSE: A written description of the proposed development is included in the narrative response of this submittal in Section 3.3. This narrative is supported by Figures 3-5, which shows items indicted in subsections (2) and (3).

(2) *A site plan of the property showing:*

(a) *Property lines;*

(b) *Location and size of all existing and proposed buildings and structures;*

(c) *Contour lines and topographic features such as ravines or ridges. In addition, detailed topographic information of the development area, adjacent areas of the site, and a topographic delineation of the SEC-wr and SEC-s riparian area affected by the project. Contour information shall be determined by a field survey by an Oregon licensed surveyor. (Contour intervals shall be no greater than 5 feet);*

(d) *Boundaries of ground disturbing activities, including proposed fill, excavating, site contouring or other landform changes;*

(e) *Location and predominant species of existing vegetation on the parcel (wooded areas), areas where vegetation will be removed, and location and species of vegetation to be planted, including landscaped areas;*

(f) *Location and width of existing and proposed roads, driveways, and service corridors;*

(g) *Location of natural drainageways, springs, seeps, water bodies and wetlands on the site;*

(h) *Location of all existing trees of a caliper greater than six (6) inches in diameter at breast height (DBH);*

(i) *Location of wells, utility lines, stormwater drainage control systems, sanitary tanks and drainfields (primary and reserve);*

(j) *A scaled drawing of the building design and elevations that show the relationship between the building and existing and finished grades and existing or proposed vegetation.*

(3) *A description and map of soil types in the proposed development area and the locations and specifications for all proposed draining, filling, dredging, and vegetation removal, including the amounts and methods.*

RESPONSE: The criteria outlined in subsections (2) and (3) are included in Figures 3-5.

(4) *Preparation of a report which includes plans and surveys by a qualified wetland or riparian consultant, fish and wildlife biologist, or other qualified professional at the discretion of the Planning Director. Approval of another qualified professional must be granted before the report is completed. Wetlands shall be identified and delineated by a qualified wetland specialist. The consultant shall prepare a report which includes:*

(a) *An assessment of the existing condition of the Riparian Area in accordance with MCC 39.5590 (D);*

(b) *An inventory of vegetation, including percentage ground and canopy coverage, and location of nuisance and invasive non-native plants as defined in MCC 39.5520;*

RESPONSE: The criteria of subsections (4)(a) through (b) are included in the application in Section 3.3.1 and include an assessment of the three on-site VCs in accordance with MCC §39.5590 (D), and a general inventory of dominant native vegetation and location of nuisance and invasive plants.

(c) *A detailed Mitigation Plan as described in MCC 39.5590 (D).*

RESPONSE: A detailed plan outlining mitigation is included in the Stream Conservation Plan that is included in Appendix C.

(5) *The applicant shall provide evidence that when federal or state requirements apply, that the agency has been contacted, and shall provide an assessment of whether the project can meet the requirements based on the agency response.*

RESPONSE: A wetland delineation was conducted by a team of qualified wetland specialists to identify wetlands and waters present on site in 2024. Impacts to wetlands have been avoided to avoid state or federal permitting requirements.

(6) *The Planning Director may also require the applicant to provide additional information, beyond that listed in this section such as a report prepared by an appropriate subject matter expert, where needed to address relevant approval criteria.*

RESPONSE: As of submittal, the Planning Director has not requested additional information related to the SEC overlays.

(C) *SEC-wr and SEC-s Permit Approval Criteria.*

(1) *Except for the exempt uses listed in MCC 39.5590 and the existing uses pursuant to MCC 39.5525, no development shall be allowed within a Riparian Area unless the provisions of subsections (2) or (3) and (4) below are satisfied. An application shall not be approved unless it contains the site analysis information required (B) above.*

RESPONSE: The proposed development does not meet exempt uses listed in MCC 39.5590, nor the existing uses indicated within MCC §39.5525. Criteria of subsection (2) are not met as impacts within 100 feet of top of bank are proposed. The applicant has selected to provide an Alternatives Analysis to meet subsection (3) and meet all criteria of subsection (4), see respective sections for details.

(2) *Low Impact Sites - Development on parcels in locations that would have low impacts on Riparian Areas may be exempt from the Alternatives Analysis in subsection (3) below. Development on sites that meet the following criteria may be allowed pursuant to the other applicable requirements of this Overlay including the Development Standards of subsection (4) and the provisions for Mitigation in subsection (D):*

(a) *The entirety of the development site is at least one hundred (100) feet from top of bank or top of ravine, which ever results in a greater distance from the Protected Water Feature. Top of ravine is the break in the > 25% slope. Slope should be measured in 25-foot increments away from the water feature until the slope is less than 25% (top of ravine), up to a maximum distance of 200' from the water feature. Where multiple resources are present (e.g., streams with wetlands along banks), the starting point for measurement should be whichever offers greatest resource protection.*

RESPONSE: This criterion is not met; the area of encroachment where the proposed removal and replacement of an existing walking trail falls within 100 feet of the top of bank.

(3) *Alternatives Analysis Sites - Development proposed within a Riparian Area may be allowed if there is no alternative, when the other requirements of the Overlay including the Development Standards of subsection (4) and the provisions for Mitigation in subsection (D) are met. The applicant shall prepare an alternatives analysis which demonstrates that:*

(a) *No practicable alternatives to the requested development location exists on the property further than 100 feet from the protected water feature; and*

- (b) Development within the Alternative Analysis Site in the Riparian Area has been limited to the minimum area necessary to allow for the proposed use;*
- (c) Development shall occur as far as practically possible from the protected water feature; and*
- (d) The Riparian Area can be restored to an equal or better condition; or*
- (e) Any net loss on the property of Riparian Area is mitigated.*

RESPONSE: No impacts are proposed to the Riparian Area. The proposed development includes the paving of an existing unpaved walking trail and temporary construction parking area within 100 feet of the top of bank, as well as the removal and replacement of a parking lot within the SCA. These locations have been selected as there are no practicable alternatives available on the site that would reduce encroachment into the SCA overlay or increase distance from top of bank.

The paving of the existing unpaved walking path with pervious pavers will improve conditions for both users and the site, as the current alignment consists of a chipped path that becomes eroded and excessively muddy following precipitation. By updating the trail, the user experience will be enhanced and erosion will be reduced. The addition of pervious surface is not expected to generate additional runoff. Any reduction to the walking trail improvements lot that would reduce the encroachment into the 100-foot top of bank buffer would not provide a suitable amount of trail for users, as the proposed alignment allows for users to approach the wooded areas of the site, which may be beneficial for well-being while undergoing medical treatment. Other “open” areas on site within the 100-foot top of bank buffer are currently in use as septic facilities or pow-wow ground, neither which are appropriate for a trail alignment.

The temporary parking area was selected due to availability of appropriate and accessible surface, as other graded surfaces on site are currently not an appropriate grade and/or in use for septic surfaces. The temporary parking area is also adjacent to a part of VC B, the area on site selected for mitigation, which will be planted with an appropriate number of native trees and shrubs following completion of construction. The temporary parking area falls primarily within the “Degraded” VC C but cannot be enhanced to “Good” condition following completion of construction due to its proximity the septic equipment area serving the site, where access must be retained for vehicles serving the septic area, as well as adequate distance from potential damage caused by tree roots.

Areas within the parcel that fall outside of the SCA are instead best suited for use of the proposed replacement of the medical treatment facility. Leaving the parking lot as-is was not considered as an option, as the current condition of the parking lot is poor and will require replacement in the near future if not undertaken during the proposed development. The preferred location of the parking lot was selected as the existing parking lot is located within the same footprint, which is currently located as far as possible from the protected water feature without forcing encroachment of other existing or proposed development into nearby resources. The replacement of the existing parking lot will also allow for the construction of a modernized below-ground stormwater treatment facility and will help to treat stormwater from the site more efficiently before it outfalls by the nearby riparian area and McCarthy Creek. While the proposed replacement of the existing parking lot falls within the SCA, no area within 100 feet from the top of bank nor the riparian area below the top of bank will be directly impacted by the parking lot replacement, as the area extending from the top of bank is graded and managed as turf and will not require clearing. As the proposed development will not result in any loss of existing riparian quality.

Several alternative site plans were discussed during prior to the preferred plan, which have been excerpted from the 2023 Preliminary Site Development Evaluation Overview in Appendix D. In each of the alternative layouts, the pedestrian trail alignment remained the same, as the current alignment best meets the user needs of the trail. Other locations for parking and the building were explored, but none reduced the amount of encroachment into the SCA or within 100 feet from top of bank. As a result, the proposed design of the site represents the best option that both reduces impacts to the SCA while also meeting the needs of the site use.

(4) *Development Standards; Development within the Riparian Area shall comply with the following standards:*

- (a) *Development of trails, rest points, viewpoints, and other facilities in public and private parks for the enjoyment of the resource must be done in such a manner so as to minimize impacts on the natural resource while allowing for the enjoyment of the natural resource.***

RESPONSE: This criterion is met; the existing foot path along the top of bank that encircles the septic drain field and pow-wow grounds is approximately 36-42” wide and is not paved or graveled; but rather it is maintained using bark chips. The proposed development includes the addition of pervious pavers within the existing alignment as well as several benches for users. The goal of the proposed improvements will allow for patients of the treatment facility to enjoy the riparian area and exercise while minimizing impacts from increase impervious surfaces and will not require clearing of vegetation or grading. No additional impacts beyond this maintenance are proposed so as to minimize additional impacts.

- (b) *Development in areas of dense standing trees shall be designed to minimize the numbers of trees to be cut. No more than 50 percent of mature standing trees (of 6-inch DBH or greater) shall be removed without a one-for-one replacement with comparable species. Replacement trees shall be placed within the riparian corridor or adjacent to it to provide shade and water retention. Size of the replacement trees shall be 5 gallon or greater. The site plan for the proposed activity shall identify all mature standing trees by type, size, and location, which are proposed for removal, and the location and type of replacement trees.***

RESPONSE: This criterion is met; no areas of dense standing trees meeting the above criterion will be cut. Four trees are to be removed from the existing parking lot area with the overlay for the purpose of removal and replacement of the existing parking lot. A total of 60 native trees will be planted within the proposed development, 13 of which are within the overlay layer adjacent to or within the proposed parking lot area.

- (c) *Areas of standing trees, shrubs, and natural vegetation shall remain connected or contiguous, particularly along natural drainage courses, so as to provide a transition between the proposed development and the natural resource, to provide food, water, and cover for wildlife, and to protect the visual amenity values of the natural resource.***

RESPONSE: This criterion is met; no areas of trees, shrubs, or natural vegetation shall be removed in a way that fractures connectivity along natural drainage courses.

- (d) *The Riparian Area shall be restored to "Good Corridor condition" as defined in MCC 39.5590 (D)(1), and maintained in accordance with the mitigation plan pursuant MCC 39.5590 (D).***

RESPONSE: This criterion will be met where applicable. Two areas totaling 14,523 sf of “Marginal” VC (VC B) are located within the stream conservation area (SCA) that are suitable for enhancement to a “Good” condition. The 107,307 sf of “Degraded” VC C cannot be restored to “Good corridor condition” as it is primarily in use as septic drain field and septic equipment,

transmission line corridor, as well as a walking path for residents. Any other remaining open areas in VC C are used for pow-wow grounds or for other events at the site unique to the treatment modalities in use at the medical facility and must remain as-is. The suitable mitigation areas shall be cleared of invasives and replanted with native shrubs and an appropriate native riparian seed mix in sufficient quantities to bring the site into compliance with MCC §39.5590 (D)(1). VC A, or the remaining 150,700 sf of area within the SCA is currently in “Good” condition and cannot be further enhanced as a result.

The site shall be monitored in accordance with MCC §39.5590 (D), please see Appendix C for the Stream Conservation Plan for additional details.

(e) To the extent practicable, existing vegetation shall be protected and left in place.

RESPONSE: This criterion is met; two native trees shall be removed from the existing parking lot area above the top of bank. These trees are not contiguous with the forested areas on site and shall be replaced as a part of the parking lot planting (Figure 5). No additional native vegetation shall be removed.

(f) Prior to construction of the development, the boundaries of the Riparian Area shall be flagged, fenced or otherwise marked and shall remain undisturbed except as otherwise allowed by the permit. Such markings shall be maintained until construction is complete.

RESPONSE: This criterion will be met; no impacts are proposed to the Riparian Area and the top of bank shall be marked to minimize disturbance. Please see Erosion Control Plan included in the application materials.

(g) Stormwater drainage control facilities:

(i) Stormwater management shall be conducted in a manner that does not increase the flow of stormwater to the stream above pre-development levels.

RESPONSE: This criterion is met; stormwater produced by the proposed development shall be transported to a below-ground stormwater treatment facility located below the proposed parking lot replacement and will improve stormwater treatment. From this facility, stormwater will be conveyed along the existing alignment to the existing outfall outside of the Riparian Area of McCarthy Creek, which will be replaced in the existing location.

(ii) The stormwater drainage control facility may only encroach a maximum of 25 feet into the outside boundary of the Riparian Area of a primary water feature; and

RESPONSE: This criterion is met; the proposed below-ground stormwater treatment facility will not exceed this encroachment. The alignment conveying stormwater from the facility to the outfall is existing and is being replaced, meeting the criterion MCC §39.5515 (A)(2)(b), which states that “maintenance and repair of existing flood control facilities” is exempt from all SEC requirements.

(iii) The area of encroachment must be replaced by adding an area equal in size and with similar functions and values to the Riparian Area on the subject property.

RESPONSE: This criterion is met; no encroachment into the Riparian Area is proposed. See Figure 5 for the location of the Riparian Area and all proposed development.

- (h) *The nuisance and invasive nonnative plants, as defined in MCC 39.5520, shall not be used as landscape plantings within the Riparian Area.*
(i) *Areas of erosion or potential erosion shall be protected from loss by appropriate means. Appropriate means shall be based on current Best Management Practices.*

RESPONSE: This criterion is met; no nuisance or invasive non-native plants shall be used in landscaping. All areas of potential erosion shall be protected from loss using appropriate means. An Erosion and Soil Control Plan has been submitted with the complete application for the proposed development, see complete land use application.

- (i) *Soil disturbing activities within a Riparian Area shall be limited to the period between June 15 and September 15. Revegetation/soil stabilization must be accomplished no later than October 15.*

RESPONSE: This criterion is met; soil disturbing activities within the Riparian Area shall be limited to the date range described above.

- (j) *Outdoor lighting shall be of a fixture type and shall be placed in a location so that it does not shine directly into undeveloped Riparian Areas. Where illumination of a Riparian Area is unavoidable, it shall be minimized through use of a hooded fixture type and location. The location and illumination area of lighting needed for security of public utility facilities shall not be limited by this provision, but should be done in a minimalist manner.*

RESPONSE: This criterion is met; all outdoor lighting shall meet the description above, as well the criteria for outdoor lighting identified in MCC §39.5570 for areas within the SEC-v (Significant Scenic View) overlay.

- (k) *A bridge or open-bottom culvert, which does not disturb the bed or banks of the stream and is in compliance with the County's Flood Hazard regulations shall be utilized for any crossing of a protected streams.*

RESPONSE: This criterion is met; no bridges or culverts are proposed.

(D) *Mitigation: Mitigation shall be required to offset the impacts of development within the Riparian Area. This subsection establishes how mitigation can occur.*

- (1) *Vegetated Corridor Condition: For the purposes of the SEC-wr Overlay, vegetated corridor conditions are defined below.*
(a) *Good Corridor: A combination of native trees, shrubs, and groundcover covering greater than 80% of the area, and greater than 50% tree canopy exists (aerial measure).*
(b) *Marginal Corridor: A combination of native trees, shrubs, and groundcovers covering 50-80% of the area and/or 26-50% tree canopy exists (aerial measure).*
(c) *Degraded Corridor: A combination of native trees, shrubs, and groundcovers covering is less than 50% of the area, and/or less than 25% tree canopy exists (aerial measure), and/or greater than 10% of the area is covered by invasive, non-native species.*

RESPONSE: The corridor was determined to have three distinct VCs.

Vegetated corridor (VC) A (150,700 sf) lays within the area below the top of bank of the stream resource and is considered "Good" due to the native tree canopy that exceeds 50% and approximately 80% overall cover of native trees, shrubs, and groundcover. Areas of non-native or nuisance vegetation within this area consist primarily of small areas of Himalayan blackberry and reed canarygrass adjacent to the banks of the stream resource. Dominant native trees include big leaf maple, red alder, and pacific willow (*Salix lasiandra*); with the shrub and herbaceous stratum dominated by sitka willow (*Salix sitchensis*), pacific ninebark (*Physocarpus capitatus*), beaked hazel (*Corylus cornuta*), and cattail (*Typha latifolia*). No impact or mitigation is

proposed within VC A.

VC B (14,523 sf) is considered “Marginal” and includes two areas within the SEC-s overlay where the native tree canopy consists primarily of mature big leaf maple (*Acer macrophyllum*) and cottonwood (*Populus balsamifera*) with approximately 70% canopy cover, as well as an understory dominated by Himalayan blackberry (*Rubus armeniacus*). No development or impacts are proposed within these areas, aside from use as mitigation area. See Stream Conservation Plan for additional details.

VC C (107,317) is considered “Degraded” and lays within area above top of bank, where temporary and permanent impacts are proposed. This area currently contains a paved parking lot and building access area, a septic drain field, septic equipment area, an unpaved walking trail, managed turf, and a transmission line corridor. It is considered “Degraded” due to the tree canopy that falls below 25% and high cover of non-native turf grasses. All construction within the stream conservation overlay will be within VC C. No area of VC C is suitable for mitigation due to current uses that are not compatible with mitigation.

- (2) **Mitigation Sequence: Mitigation includes avoiding, minimizing or compensating for adverse impacts to regulated natural resource areas.**
 - (a) **When a proposed development could cause adverse impacts to a natural resource area, the preferred sequence of mitigation as defined in 1 through 5 below shall be followed unless the applicant demonstrates that an overriding public benefit would warrant an exception to this preferred sequence.**
 - (i) **Avoiding the impact altogether by not taking a certain action or parts of actions on that portion of the site which contains the regulated natural resource area;**
 - (ii) **Minimizing impacts by limiting the degree or magnitude of the action and its implementation.**
 - (iii) **Compensating for the impact by repairing, rehabilitating, or restoring the affected environment;**
 - (iv) **Compensating for the impact by replacing, enhancing or providing substitute resources or environment on-site;**
 - (v) **Compensating for the impact by replacing, enhancing or providing substitute resources or environments off-site.**

RESPONSE: There are no impacts proposed to the “Good” VC A; subsection (i) is utilized, and impacts are avoided.

Permanent impacts proposed to the “Degraded” VC C are required to meet the minimum needs for the site and do not exceed existing disturbance. The majority of VC C cannot be restored as the area has historically been utilized as pow-wow grounds, a walking path, septic facilities and drain field, a parking lot that will be removed and replaced, and transmission line corridor. Impacts through the replacement of the parking lot within the SCA cannot be avoided, as no other areas that fall outside of the overlay are available on site. Temporary impacts to VC C include the temporary parking for construction personnel, the area of which shall contain Erosion and Soil Control measures during construction, as well as returning the area to current conditions. As such, subsections (ii) and (iv) are utilized, with impacts being minimized and enhancement of resources on site.

Two areas within consisting of “Degraded” VC B have been identified for mitigation, as enhancement to “Good” condition will not conflict with the current use. Please see Figure 5 for the location of the mitigation area.

- (b) *When evaluating potential impacts to the natural resource, the County may consider whether there is an overriding public benefit for the public project given:*
 - (i) *The extent of the public need for the proposed development;*
 - (ii) *The functional values of the Riparian Area that may be affected by the proposed development;*
 - (iii) *The extent and permanence of the adverse effects of the development on the Riparian Area, either directly or indirectly;*
 - (iv) *The cumulative adverse effects of past activities on the Riparian Area either directly or indirectly; and*
 - (v) *The uniqueness or scarcity of the Riparian Area that may be affected.*

RESPONSE: Acknowledged. The proposed development seeks to expand and modernize a medical facility that provides culturally relevant residential addiction treatment to American Indian and Alaska Native people. As such, the services and greater good provided by the proposed are likely to meet subsection (i). Additionally, areas within the SEC-s overlay where development and disturbance are proposed are areas where the overall functional value of the stream resource are not likely to be impacted.

- (3) *Compensatory Mitigation: General Requirements. As a condition of any permit or other approval allowing development, compensatory mitigation shall be required to offset the encroachment of the development into the area. The mitigation shall meet the following:*
 - (a) *Any person who alters or proposes to alter a Riparian Area shall restore or create a vegetated corridor equivalent to or larger than the altered corridor in order to compensate for resource losses.*
 - (b) *The following ratios apply to the creation or restoration of the vegetated corridor. The first number specifies the amount of vegetated corridor to be created and the second specifies the amount of Riparian Area to be altered or lost. Creation (off-site) 2:1 Restoration (off-site) 1.5:1 Creation (on-site) 5:1 Restoration (on-site) 1:1*
 - (c) *Only Marginal or Degraded Corridor(s) as defined in MCC 39.5590 (D)(1) may be the subject of a restoration project proposed as part of a Mitigation Plan.*
 - (d) *Highest priority sites for mitigation are Marginal or Degraded Corridor(s) that are closest to a natural drainage on the property, and areas which will increase contiguous areas of standing trees, shrubs, and natural vegetation along drainages.*

RESPONSE: A total of 13,470 sf of impact is proposed within the Riparian Area designated as “Degraded” VC C. Due to the nature and use of the site, a total of 14,523 sf of VC B within the SCA is suited for mitigation to “Good” condition, as all other areas within the SCA are either in “Good” condition (VC A) or not suitable for restoration due to the use of the site (VC C). As a result, only VC B shall be restored to “Good” condition. See Figure 5 for the locations of areas to be restored.

There are two distinct areas within the “Marginal” VC B, one of which is location directly adjacent to the “Good” VC A, the other being adjacent to the “Degraded” VC C. No other areas within the SCA suited for restoration are adjacent to the “Good” VC A.

- (e) *The off-site mitigation shall be as close to the development as is practicable above the confluence of the next downstream tributary, or if this is not practicable, within the watershed where the development will take place or as otherwise specified by the County and shall comply with (c) and (d) above.*

RESPONSE: This criterion is not applicable; no off-site mitigation is proposed.

- (f) In order to ensure that on-site mitigation areas are established and maintained, the property owner shall record the mitigation plan approval in the deed records of Multnomah County. In order to ensure that offsite mitigation areas will be protected in perpetuity, the owner shall cause a deed restriction to be placed on the property where the mitigation is required. The deed restriction shall be irrevocable unless a statement of release is signed by an authorized representative of Multnomah County.*

RESPONSE: The on-site mitigation area shall record the mitigation plan record in the deed records of Multnomah County.

- (4) Mitigation Plan Standards: Natural resources mitigation plans shall contain the following:*
- (a) A description of adverse impacts that could be caused as a result of development.*
 - (b) An explanation of how adverse impacts to resource areas will be avoided, minimized, and/or mitigated.*

RESPONSE: Narrative describing the criteria outlined in subsections (4)(a) and (b) are included in the Stream Conservation Plan included in Appendix C.

- (c) A list of all responsible parties including, but not limited to, the owner, applicant, contractor, or other persons responsible for work on the development site.*

RESPONSE: The owner is Native American Rehabilitation Association of the Northwest (NARA-NW). The applicant is Kim Knox of Shields Oblatz Johnsen (SOJ). Contractors for demolition, site preparation, construction, and restoration will be determined at a later date, following approval of all application materials.

- (d) A map drawn to scale, showing where the specific mitigation activities will occur.*

RESPONSE: Please see Figure 5 for location of mitigation activities.

- (e) An implementation schedule, including timeline for construction, mitigation, mitigation maintenance, monitoring, reporting and a contingency plan. All in-stream work in fish-bearing streams must be done in accordance with the Oregon Department of Fish and Wildlife in-stream timing schedule.*

RESPONSE: Construction is proposed to occur from 2026-2027, followed by mitigation implementation. Maintenance will take place as needed in perpetuity. Monitoring shall occur for 5 years following completion of mitigation installation and shall take place within May and October. A monitoring report describing survival and site conditions, including assessment of the Riparian Area shall be submitted by December 31st of each year. No in-stream work in any stream is proposed.

- (f) Mitigation work shall be completed prior to initiation of development where possible.*
- (i) Where existing vegetation has been removed, or the original land contours disturbed, the site shall be revegetated, and the vegetation shall be established in the next planting season.*
 - (ii) Nuisance and invasive nonnative plants, as defined in MCC 39.5520, or other debris and noxious materials shall be removed and be kept removed from the Riparian Area by the property owner.*
 - 1. Removal shall be by hand or mechanically with small equipment, as appropriate to minimize damage to existing native vegetation.*
 - 2. interim erosion control measures such as mulching shall be used to avoid erosion on bare areas.*

3. *Nuisance and invasive nonnative plants, as defined in MCC 39.5520, shall be replaced by the next growing season with native plants that are appropriate to the site conditions to restore the vegetated corridor.*

RESPONSE: A total of four trees has been proposed for removal within the SCA due to the removal and replacement of a parking lot. Upon construction, a total of twelve new trees shall be planted surrounding the parking lot within the SEC-s overlay, which will occur within the following planting season. No other native vegetation is proposed for removal within the overlay; all other vegetation disturbance and removal will include non-native turf grass. Any nuisance or invasive plants present within the proposed development area shall be removed and replaced with native plants. Erosion and soil conservation measures, including the placement of mulch, shall be practiced to avoid erosion of any denuded areas.

(E) Required Conditions of Approval for all SEC-wr and SEC-s Permits.

- (1) *Provide certification by a professional wetland or riparian consultant, fish and wildlife biologist, landscape architect, or other qualified professional as determined by the Planning Director, that the riparian/vegetated corridor was restored according to the mitigation plan and that the vegetated corridor will qualify as “Good Corridor” within 5 years.*

RESPONSE: Certification by a qualified professional shall be provided within the 5th and final monitoring report.

- (2) *The plantings shall be monitored for five years to ensure that the vegetation naturalizes. Failure of vegetation to be maintained in a healthy growing state shall require continued monitoring by a professional.*
 - (a) *A yearly report shall be provided to Multnomah County Land Use Planning outlining the condition of the plantings and if any modifications to the mitigation plan are necessary. Any proposed modifications to the mitigation plan require written approval by Multnomah County Land Use Planning.*

RESPONSE: Annual monitoring reports shall be submitted to the Multnomah County Land Use Planning Department describing the above criteria, as applicable. Success of the plantings shall consist of meeting “Good” criteria and will be replanted as needed for the 5-year monitoring period. These reports shall be submitted before December 31st of each year they are required.

- (3) *Work areas shall be carefully located and marked to reduce potential damage to the Riparian Area.*

RESPONSE: Work areas shall be identified and marked using flagging along perimeter as needed.

- (4) *Trees in the Riparian Area shall not be used as anchors for stabilizing construction equipment.*

RESPONSE: No trees within entire site shall be used as anchors for construction equipment.

5.0 SEC MITIGATION REQUIREMENTS

The proposed development meets all applicable criteria outlined in §39.5540 (C). As such, the application be processed through the Type I review procedure and does not require a Wildlife Conservation Plan. Impacts to SEC-h habitat include removal of twelve trees, none of which fall within areas meeting the standards of “forested”. As a part of the native landscaping, a total of sixty-four native trees will be planted within the SEC-h overlay, six of which fall within the SEC-s overlay, regardless of the non-requirement for mitigation.

As impacts to the site do not meet the criteria outlined in §39.5590 (A)(1), the application will be processed through the Type II process and require mitigation as well as a Stream Conservation Plan. The applicant meets the Type II requirements outlined in MCC §39.5590 (B)-(E). See Appendix C - Stream Conservation Plan for additional details.

6.0 REFERENCES

Metro, 2020. Regional Land Information System (RLIS). Title 13 Inventory. October 2005.

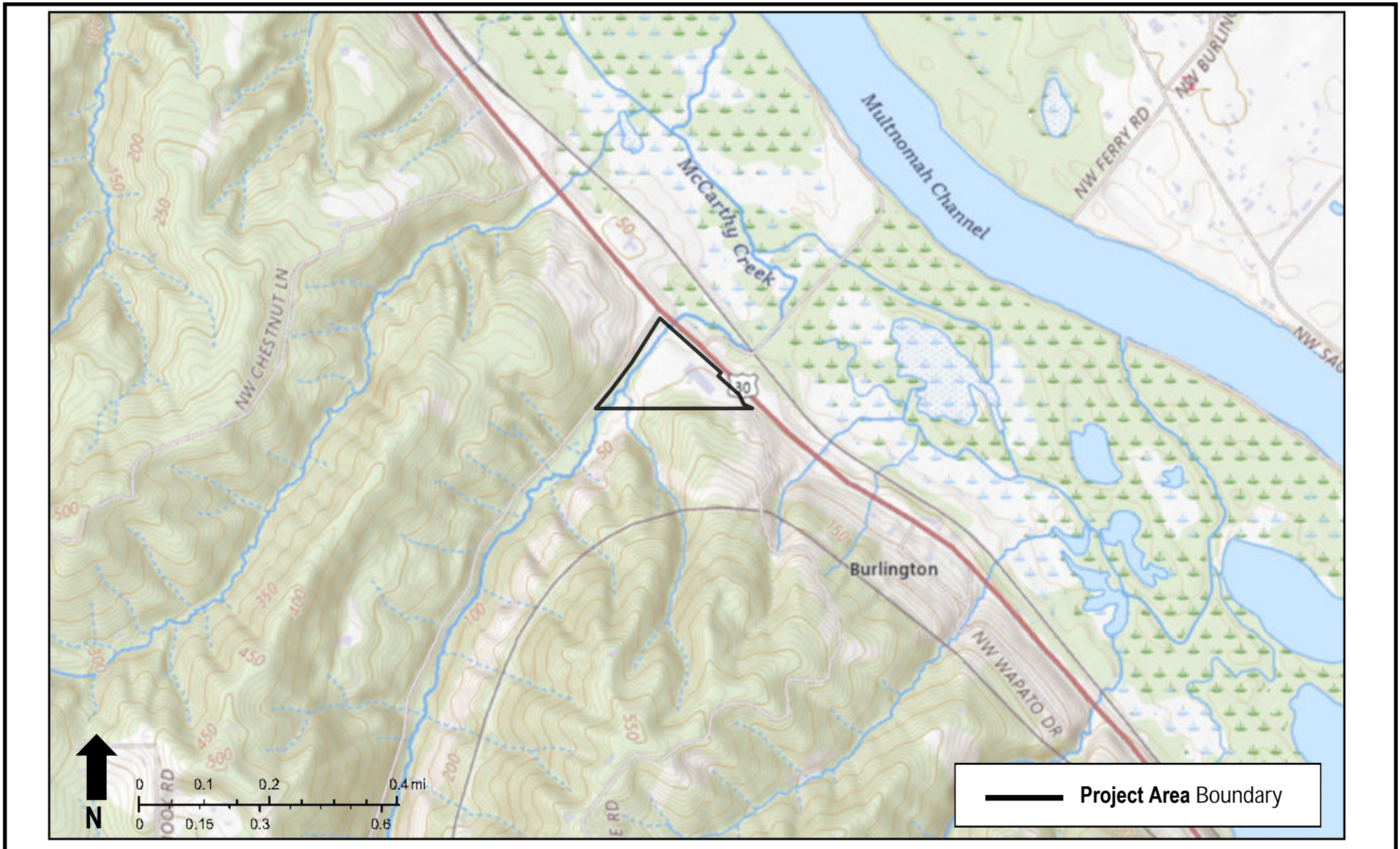
USGS, 2024. 7.5 Minute topographic map, Linnton, Oregon quadrangle.

Multnomah County Development Code. § 39.5530 *SEC Permit Criteria (Significant Environmental Concern)*; MCC 39.5540 *Criteria for Approval of SEC-h Permit – Wildlife Habitat*, MCC 39.5550 *SEC-s Permit Criteria*, MCC 39.5570 *SEC-v Permit Criteria*, MCC 39.5590 *SEC-wr Permit Criteria*.

Appendix A

Figures





Project #8018
2/23/2026

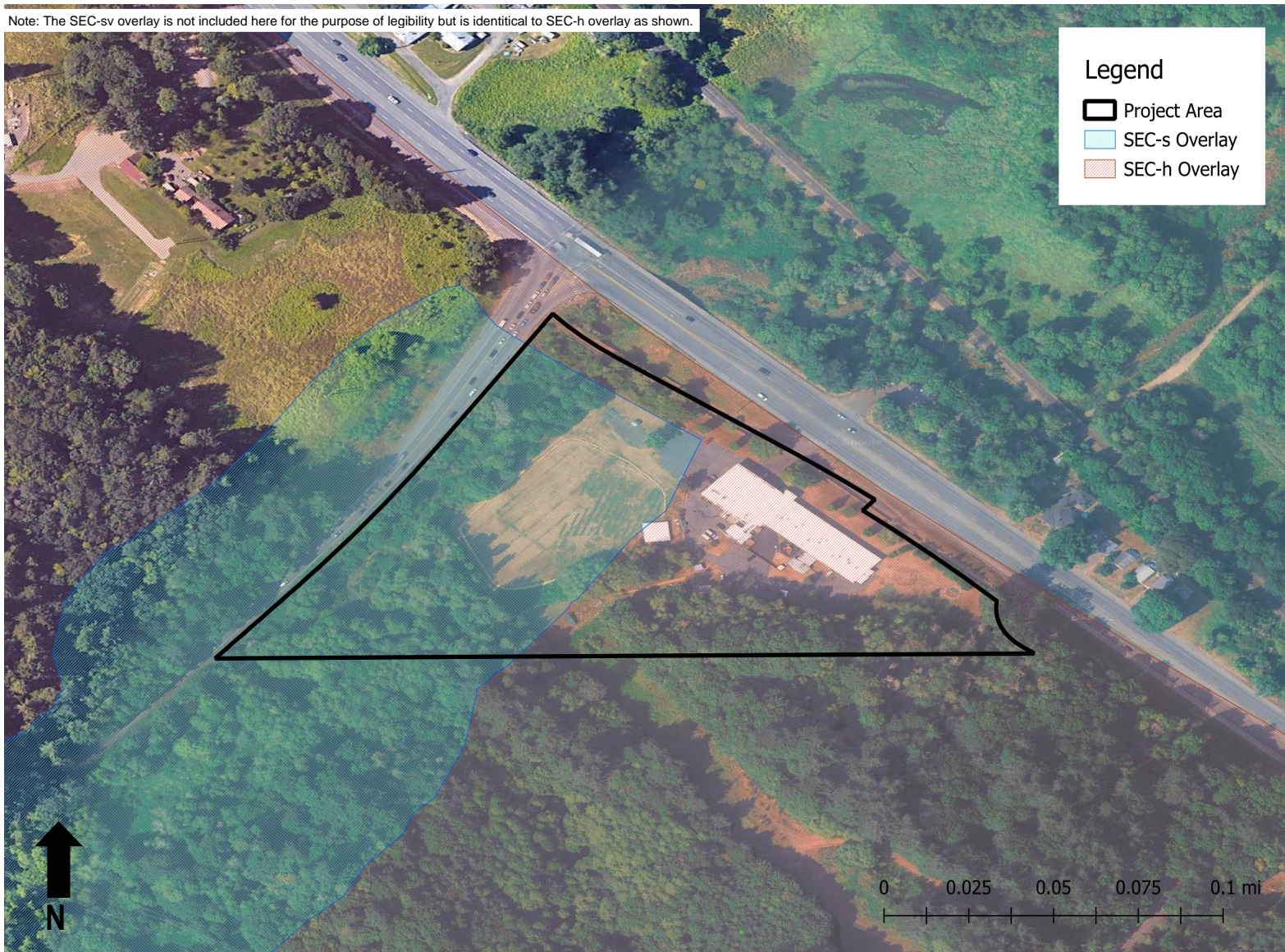


Pacific Habitat Services, Inc.
9450 SW Commerce Circle, Suite 180
Wilsonville, OR 97070

General Location and Topography
NARA NW RTC, 17645 NW St. Helens Road - Portland, Oregon
United States Geological Survey (USGS) Washougal, Washington and Sandy, Oregon 7.5 quadrangle, 2020
(viewer.nationalmap.gov/basic)

FIGURE
1

Note: The SEC-sv overlay is not included here for the purpose of legibility but is identical to SEC-h overlay as shown.



Project #8018
2/23/2026

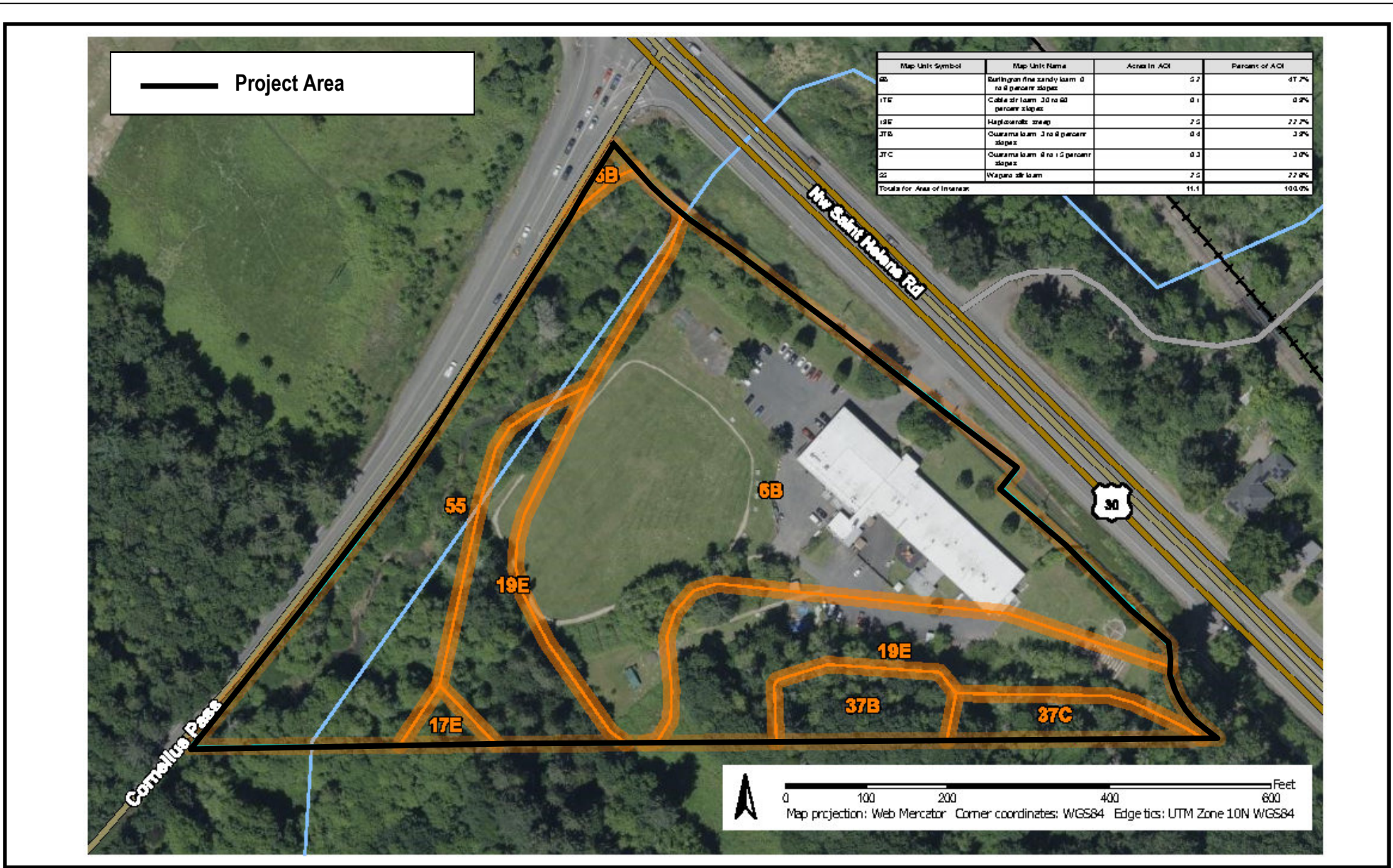


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Multnomah County Significant Environmental Concern Areas
NARA NW RTC, 17645 NW St. Helens Road - Portland, Oregon
multco.maps.arcgis.com

FIGURE

2



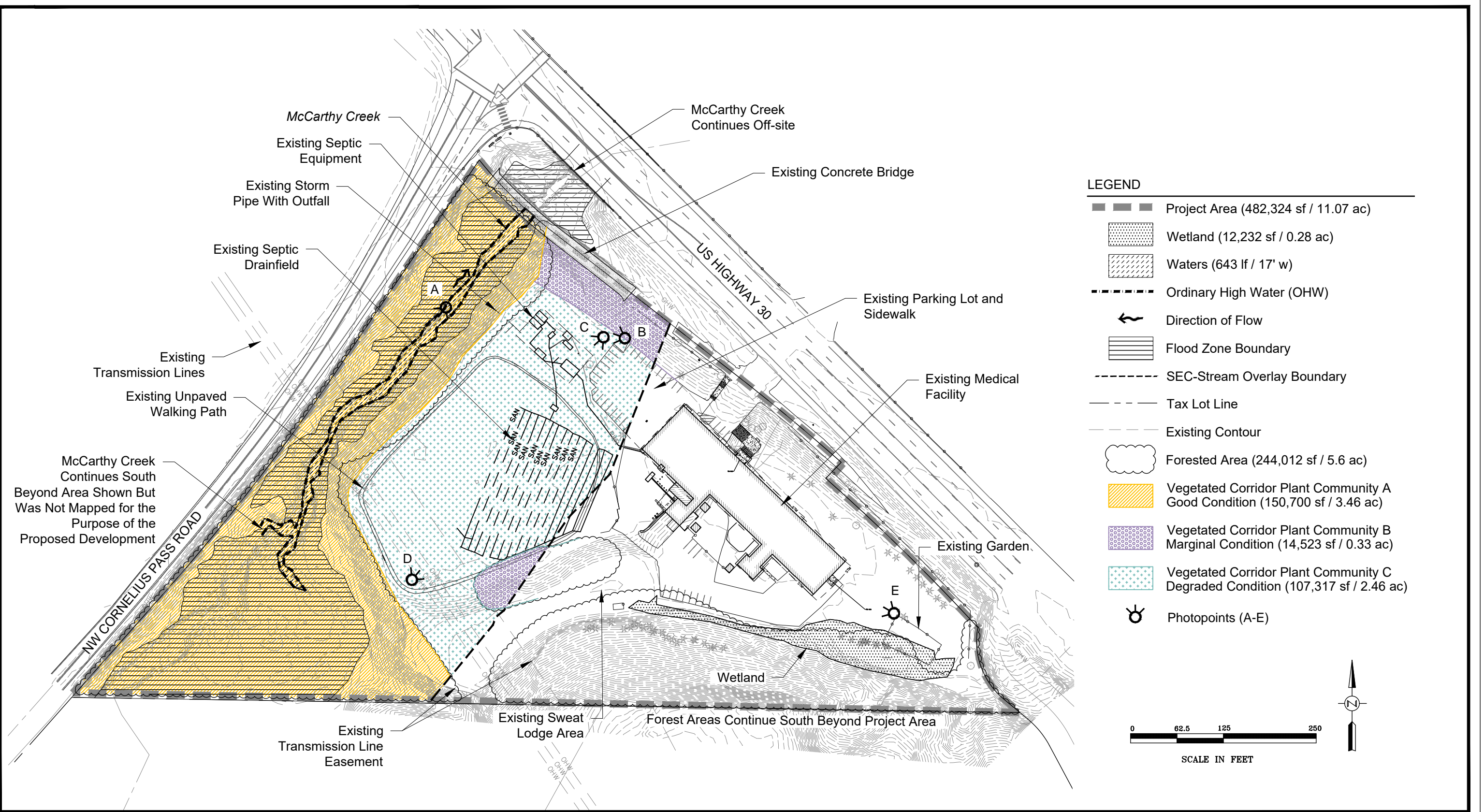
Project #8018
2/23/2026



Pacific Habitat Services, Inc.
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Wilsonville, OR 97070

Soils
NARA NW RTC, 17645 NW St. Helens Road - Portland, Oregon Natural
Resources Conservation Services, Web Soil Survey, 2025
(websoilsurvey.sc.egov.usda.gov)

FIGURE
3

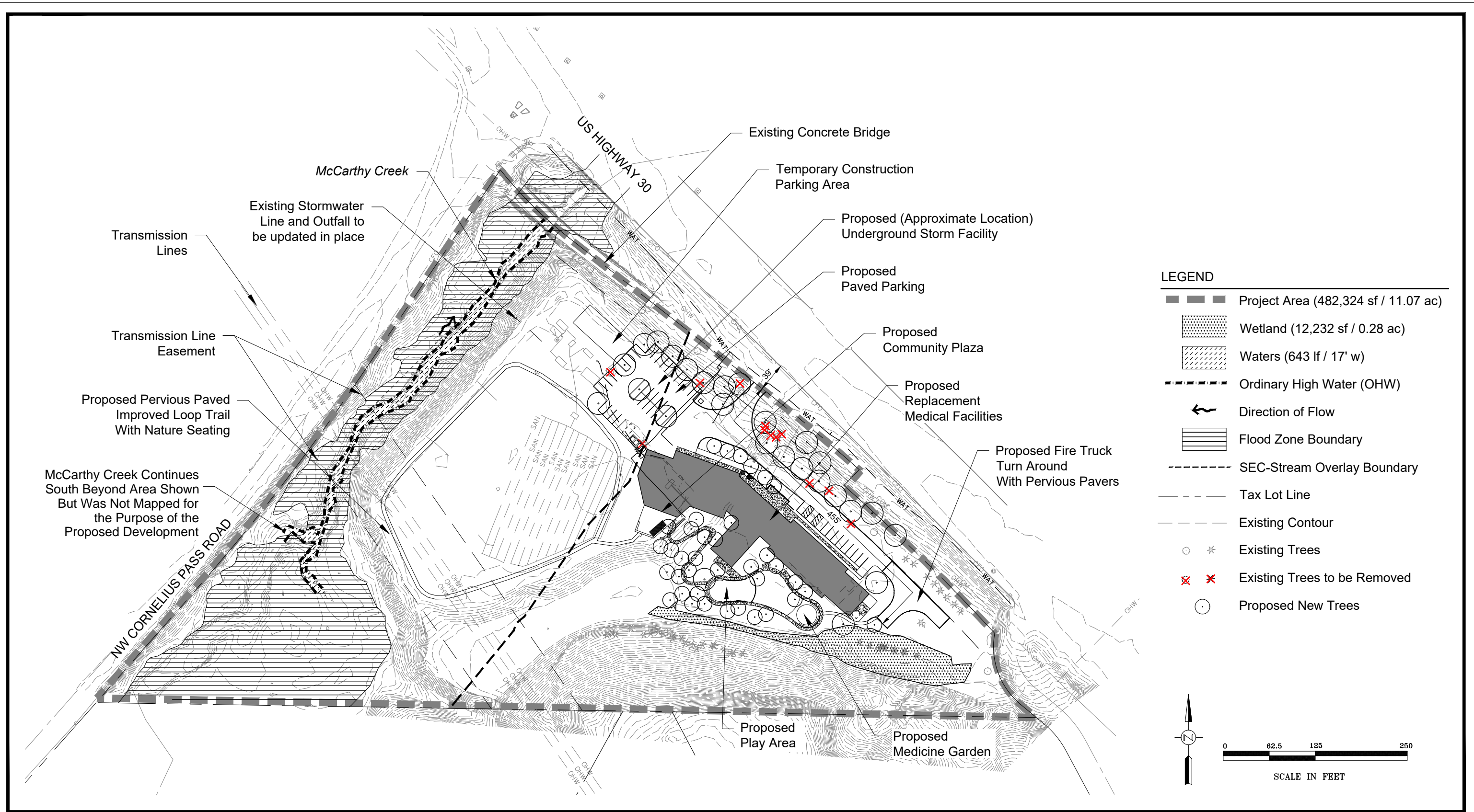


Survey provided by Tawarc and Hacker Architects.
 Accuracy is sub-centimeter.

Existing Conditions, Vegetated Corridor Plant Communities, Forested and Non-Forested (Cleared Areas)
 NARA NW RTC, 17645 NW St. Helens Road - Portland, Oregon

FIGURE
4

2-17-2026



Survey provided by Tawarc and Hacker Architects.
Accuracy is sub-centimeter.

Proposed Site Plan
NARA NW RTC, 17645 NW St. Helens Road - Portland, Oregon

FIGURE
5

2-17-2024

Appendix B

Site Photos





Photo A:

Facing SW from north bank of Burlingame Creek in VC A.

Photo B:

Facing NW toward area of VC B and VC C, showing existing septic equipment area, proposed temporary parking, and a portion of VC B where mitigation is proposed.



Project # 8018

2/18/2026



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SEC Photo documentation

17645 NW St. Helens Road - Portland, Oregon

Photos taken November 7 and 12, 2024



Photo C:

Facing SW toward VC C, including one tree to be removed within the SEC-s overlay.

Photo D:

Facing NE toward VC B and VC C, including existing walking path and a part of VC B where mitigation is proposed.



Project # 8018

2/18/2026



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Wilsonville, OR 97070

SEC Photo documentation

17645 NW St. Helens Road - Portland, Oregon

Photos taken November 7 and 12, 2024



Photo E:

Facing west from east end of existing building, near area where planting and the fire truck turnaround are proposed.

Project # 8018

2/18/2026



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Wilsonville, OR 97070

SEC Photo documentation

17645 NW St. Helens Road - Portland, Oregon

Photos taken November 7 and 12, 2024

Appendix C

Stream Conservation Plan





9450 SW Commerce Circle, Suite 180
Wilsonville, OR 97070

PACIFIC HABITAT SERVICES, INC.

(800) 871-9333 • (503) 570-0800 • Fax (503) 570-0855

February 20, 2026

**From: Miranda Geller
John van Staveren, SPWS**

**RE: Stream Conservation Plan – 17645 NW St. Helens Road, Multnomah County, OR
PHS Project Number: 8018**

INTRODUCTION

The entirety of the 11.0-acre property is designated as Significant Environmental Concern-wildlife habitat (SEC-h) and Significant Environmental Concern – scenic view (SEC-sv) by Multnomah County, as well as a 5.6-acres (246,175 square feet) of Significant Environmental Concern-stream (SEC-s) along the northwest boundary (Figure 2).

The existing development is located at 17645 NW St. Helens Road in Multnomah County, Oregon. The existing development, which includes an approximately 60-foot driveway leading from NW St. Helens Road, consists of a two-story residential treatment center with a 22,459 square foot (sf) footprint, as well as a 30,760 sf parking lot, a 1,400 sf garden, a 100 sf detached sweat lodge, a 3,424 sf unpaved walking path, 24,339 sf of septic drain field, and a 4,785 sf area containing septic facilities. The building is surrounded by several scattered native trees including Douglas fir (*Pseudotsuga menziesii*), western redcedar (*Thuja plicata*), red alder (*Alnus rubra*) black cottonwood (*Populus trichocarpa*) and big leaf maple (*Acer macrophyllum*), as well as several non-native and ornamental trees. Trees near the existing building do not meet the standards outlined in MCC § 39.5860(A)(1) for forested area. Within the northwest and southern boundaries of the subject parcel, trees present do meet these standards and are considered “forested” areas. Within these areas, groundcover is dominated by Himalayan blackberry (*Rubus armeniacus*), reed canarygrass (*Phalaris arundinacea*), water parsley (*Oenanthe sarmentosa*), and lady fern (*Athyrium filix-femina*). Within the unforested areas, including those around the existing building, groundcover is dominated by non-native turf grass (Figure 4).

The criterion of MCC 39.5590 (A)(1) is not met, as the walking path improvements and parking lot replacement are located within the SEC-s overlay and cannot be moved elsewhere within the site. (see Natural Resource Assessment). Therefore, a Stream Conservation Area (SCA) mitigation plan is required for enhancement to stream resources.

SITE DESCRIPTIONS

Stream Conservation Plan Area

The designated Stream Conservation Plan mitigation area includes a total of 150,700 sf of

“Good” Vegetated Corridor (VC) A, 14,523 sf of “Marginal” VC B, and 1107,317 sf of “Degraded” VC C within the subject parcel. Due to the existing and proposed uses of the site, only areas within VC B are suitable to use as mitigation area. These mitigation areas currently contain some mature native trees, including big leaf maple and black cottonwood, but have understories dominated by Himalayan blackberry.

The topography of the proposed mitigation areas generally slopes from south to north toward the northern boundary of the site. The north mitigation drains offsite to a roadside swale connected to the nearby McCarthy Creek. The south mitigation area does not have direct connectivity to any part of McCarthy Creek but instead drains into the graded portion of VC C containing the existing septic drain field. Elevation on site ranges from approximately 90 to 25 feet with the peak located near the southern boundary. Soils include Burlington fine sandy loam 0-8% slopes, Goble silt loam 30-60% slopes, steep Haploxerolls, Quatama silt loam 3-8% slopes and 8-15% slopes, and Wapato silt loam.

Within the west area of the SCA is McCarthy Creek, which flows from south to north and drains into the wetlands bordering the Willamette River. The substrate within this area is composed of a mix of small cobbles and fine sediments. Coho salmon have been observed within this specific reach of the creek as recently as 2021, and the area was likely historic habitat for other fish species.

PROJECT IMPACTS AND SITE ENHANCEMENT

The proposed project includes complete removal of the existing treatment center, parking lots, and driveways, followed by the construction of a new three-story treatment center with a 22,062-sf footprint, 39,440-sf of paved parking lot, sidewalk, and driveway, 4,813-sf of pervious paved walking path, and a 1,119-sf rubber playground surface. A below-ground stormwater treatment facility will be located within the northern portion of the parking lot.

STREAM CONSERVATION AREA MITIGATION PLAN

To mitigate impacts within 13,470 sf of the SCA, the code stipulates that an equal area of mitigation area shall be planted within the overlay, which exceeds the area available for mitigation on site, as much of the site is either in “Good” condition, or not has existing uses that are not suited for mitigation use. The only suitable area for planting within the SCA is VC B, a combined 14,523 sf area meeting “Marginal” standards.

The mitigation requirements do not outline a specific density, so the density outlined in MCC 39.5540 (D)(3)(d)(ii) requiring 1 tree and 1 shrub to be planted for every 100 feet of impacts shall be utilized. At that rate, a total of 213 trees and 213 shrubs are required for planting. The planting density requirements outlined in MCC 39.5540 (D)(3)(g). This criterion requires that trees shall be planted between 8 and 12 feet on-center and shrubs shall be planted between 4 and 5 feet on-center, or clustered in single species groups of no more than four plants, with each cluster planted between 8 and 10 feet on-center. Moreover, subsection (i) of the above code section stipulates that trees cannot be planted within the drip line of existing trees, with the drip line of the existing tree serving as the starting point for plant spacing measurements. The canopy of VC B to be planted is an estimated 70% cover, with much of the area outside of the drip line falling within areas not suitable for tree planting (IE in VC C outside of the SCA altogether).

Due to this, the applicant proposes that all mitigation consists solely of low shrubs that are suited for planting below the canopy.

Planting native trees, shrubs, and groundcovers will improve food and cover for insect and animal life, as well as allow for an understory to develop as overall diversity increases. Flood storage and water quality will also be improved by planting shrubs and groundcovers as their roots stabilize soils and retain water during the dry season.

Nuisance vegetation will be removed prior to planting. Mature nuisance vegetation such as Himalayan blackberry will need to be cut and removed prior to at least two treatments with herbicide. Due to the relatively steep slopes present in the mitigation areas, soils will be stabilized via placement of straw wattles or other suitable measures following the first treatment. Other nuisance vegetation will require only herbicide treatment via foliar spray. All shrubs will be container plants; they are to be at least 12” in height and planted in clusters no greater than four, with each cluster being planted 8-10’ on-center. If plants are not available, appropriate substitutions of native plants for the specific habitat conditions can be made. The native seed mix proposed is PT 400 Native Upland Mix. Seed shall be applied at a rate of 1 pound per acre. After planting and seeding is completed, the area should be covered in straw mulch or coir mats to stabilize any exposed soils and prevent erosion. Monitoring is required for 5 years and must demonstrate 80% survival of woody plants and 50% groundcover by year 5.

Below are the species proposed for planting.

Table 2 – Mitigation Plant List

Latin Name	Common Name	Size	Quantity
Shrubs			
<i>Oemleria cerasiformis</i>	oso plum	1 gallon	106
<i>Symphoricarpos albus</i>	snowberry	1 gallon	107
<i>Cornus alba</i>	red-osier dogwood	1 gallon	106
<i>Mahonia nervosa</i>	low Oregon grape	1 gallon	107
Shrub Total			426
Groundcover			
Latin Name	Common Name	Quantity	
PT 400 Native Upland Mix		1 lb./ 1000 sf	
<i>Elymus glaucus</i>	blue wildrye		
<i>Hordeum brachyantherum</i>	meadow barley		
<i>Bromus carinatus</i>	California brome		
Groundcover total			14.5 lbs. maximum

Appendix D

Alternative Site Plans



NARA NW – PRELIMINARY SITE DEVELOPMENT EVALUATION OVERVIEW

08 NOVEMBER 2023

Evaluation Purpose

Combine previous due diligence efforts into a single document, summarize site development constraints affecting project feasibility and NARA operations, and identify recommended additional due diligence/site concept investigations as appropriate.

NARA Project Goals

- Create a place for sacred ceremonies that bring our communities together to continue to heal and thrive.
- Create a place of healing, sobriety and connection to culture.
- Create spaces that provide a sense of safety, respect, community and dignity that balance individual choice with the comfort of the majority.
- Serve as a touchstone for generations.

Major Findings

- There are roughly two distinct developable areas assuming the existing driveway remains where it is. The first is to the south of the driveway (Southeast Concepts) where a 56,999 square foot program and associated site improvements can be accommodated. The second is to the north of the driveway (Northeast Concepts) where it may be necessary to reduce the building square footage to avoid impacting the existing septic field.
- Site constraints will require portions of the building be two stories to accommodate the desired program.
- None of the land use overlays prohibit NARA from advancing the targeted building program and site improvements.
- NARA operations can be physically accommodated onsite during construction if associated impacts are determined to be acceptable.
- A three-year Project Schedule is achievable; however, it is recommended that current schedule assumptions be revisited once a preferred site development scenario aligning with NARA's project goals has been identified.

Assumptions

The site and building placement are constrained by McCarthy Creek, setbacks, steep slopes, mature vegetation, transmission line easement and required fire access lanes to the building.

The site development scenarios are based upon the following factors which significantly impact building placement. Program and design refinements, contractor input and NARA feedback on the following assumptions are recommended prior to establishing a preferred site and building concept:

- 70-bed facility (septic field size)
- Current septic field location
- 55,600 square foot building (per Functional Program) – except Scenario #2
- 70 - 80 parking spaces (identified in Functional Program)
- Existing driveway location

NARA NW – PRELIMINARY SITE DEVELOPMENT EVALUATION OVERVIEW
08 NOVEMBER 2023

Project Schedule

A three-year schedule has been developed reflecting major phases of work including:

- Architect and Contractor selection and contract execution
- Preparation of Land Use application and approval (8 months)
- Preliminary/Final Design, Pricing (12 months)
- Building Permit approval (6 months)
- Construction (14 months)

It is appropriate to revisit this schedule to align with NARA project priorities once a design team and contractor are on board to refine the project program, a preferred site development strategy, project schedule and costs. Key design and construction schedule considerations include:

- Program development
- Construction phasing
- Stakeholder communications
- Public agency review/approval durations at time of application
- Project budget / funding

Project Scope / Site Alternatives

In 2022, NARA worked with a consulting firm to prepare a preliminary Functional Program for a replacement facility at the existing site. The effort evaluated and corrected deficiencies in the amount of space in the existing building and identified gross area of the different functions to be included in a replacement facility.

Service	Space (DGSF)
Public Areas	812
Resident Care	18,144
Young Adult Resident Care	6,468
Child Care	1,155
Dining	6,776
Resident Care Support	4,641
Staff and Building Support	4,116
Department Gross Square Feet	42,112
Building Circulation and Envelope (0.20)	8,422
Floor Gross Square Feet	50,534
Major Mechanical Space (0.12)	6,064
Building Gross Square Feet	56,599

NARA NW – PRELIMINARY SITE DEVELOPMENT EVALUATION OVERVIEW

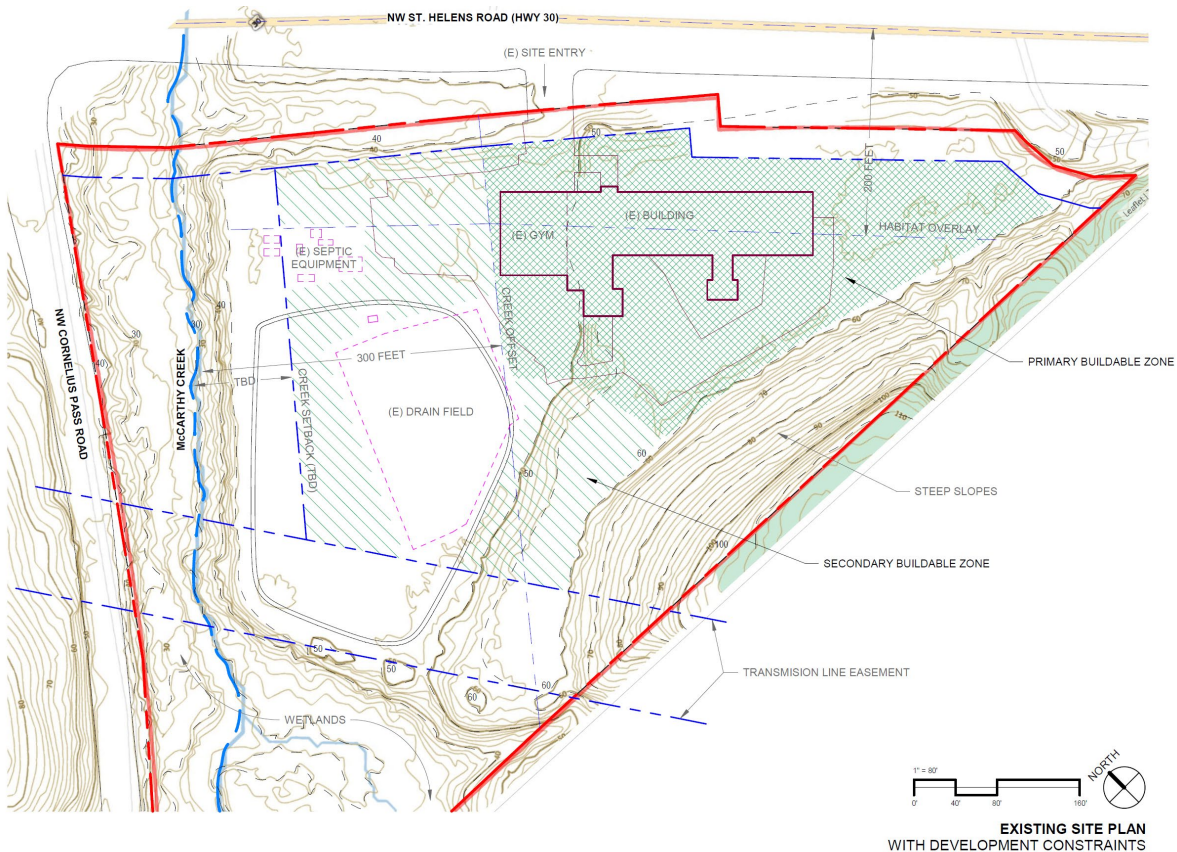
08 NOVEMBER 2023

The Functional Program also summarized staffing, workloads, operational needs, space adjacencies and building systems typically found in similar facilities. Specific zoning, easements and similar site development constraints were not factored into the assessment.

In 2023, NARA engaged the services of Michael Flowers Architects (MFA), The Bookin Group (TBG), Environmental Management Systems Inc (EMS) and AKS Engineering and asked: 1) Is there sufficient developable area to place a new building on the site? and 2) Can ongoing operations be physically accommodated onsite during construction? The answer to both of these questions is yes. Further design refinements and construction phasing evaluation will provide NARA with a better understanding of the impacts and assist in determining a preferred site development approach.

Site Development Constraints

The team identified high-level site development constraints including natural features, land use overlays, easements, septic system and site access requirements affecting siting of a replacement facility (see attached Bookin Group and EMS memos and survey).



Existing Site Plan - Development Constraints
NARA NW Adult Residential Treatment Facility
NARA Northwest | 10/26/23

Exhibit (E)

NARA NW – PRELIMINARY SITE DEVELOPMENT EVALUATION OVERVIEW

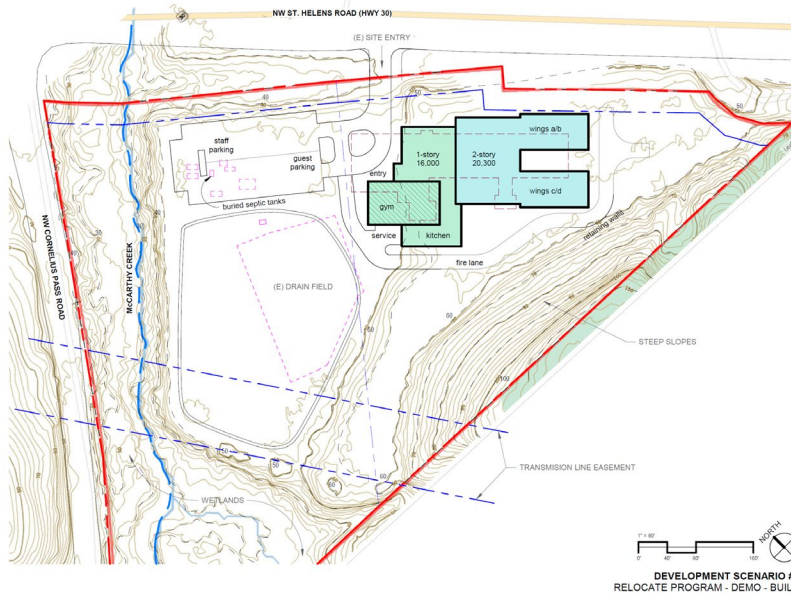
08 NOVEMBER 2023

Based upon the major site constraints, MFA prepared four site development Scenarios (MFA Memo attached) focusing development on the Southeast and Northeast portions of the site.:

Southeast Concept Moves NARA Operations offsite during construction

A.1: Relocate existing above-ground septic equipment

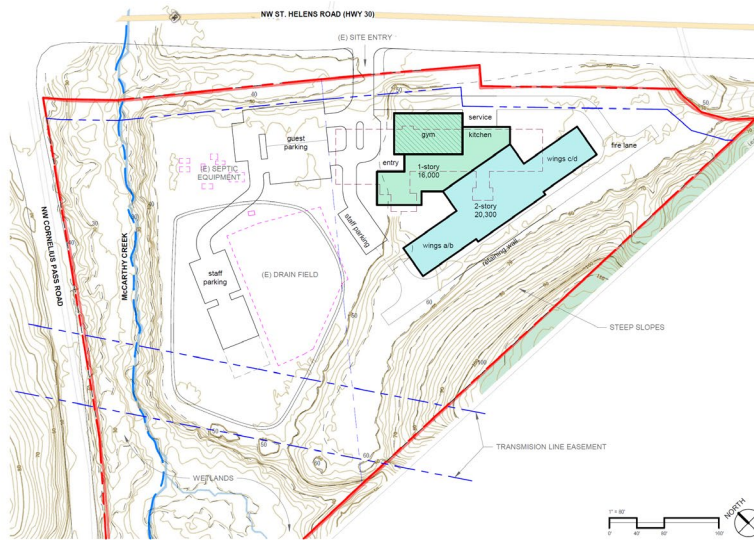
A.2: Add parking on west side of drain field; no change to septic equipment



MAI Concept Site Plan
NARA NW Adult Residential Treatment Facility
NARA Northwest | 10/26/23

DEVELOPMENT SCENARIO #4
RELOCATE PROGRAM - DEMO - BUILD

Exhibit A.1



MAI Concept Site Plan
NARA NW Adult Residential Treatment Facility
NARA Northwest | 10/26/23

DEVELOPMENT SCENARIO #4
RELOCATE PROGRAM - DEMO - BUILD

Exhibit A.2

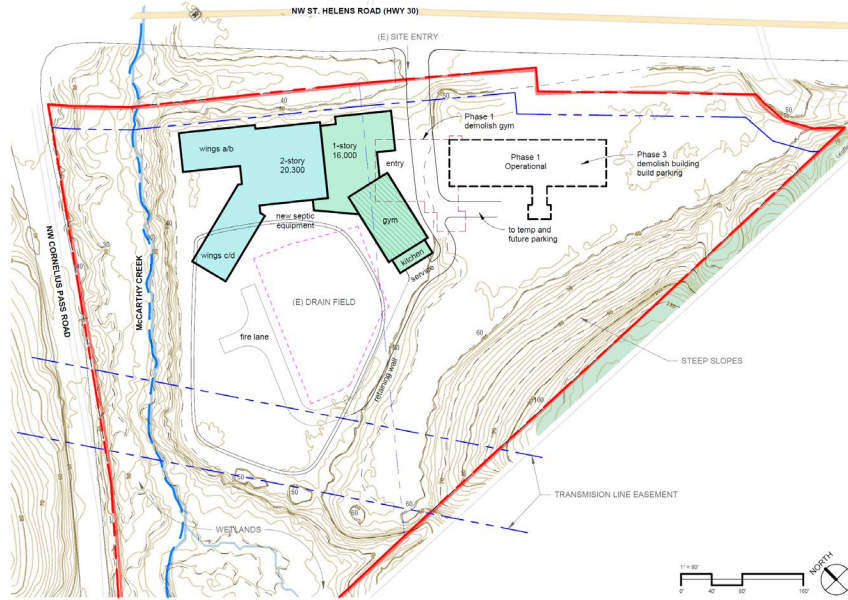
NARA NW – PRELIMINARY SITE DEVELOPMENT EVALUATION OVERVIEW

08 NOVEMBER 2023

Northeast Concept NARA Operations remain onsite during construction

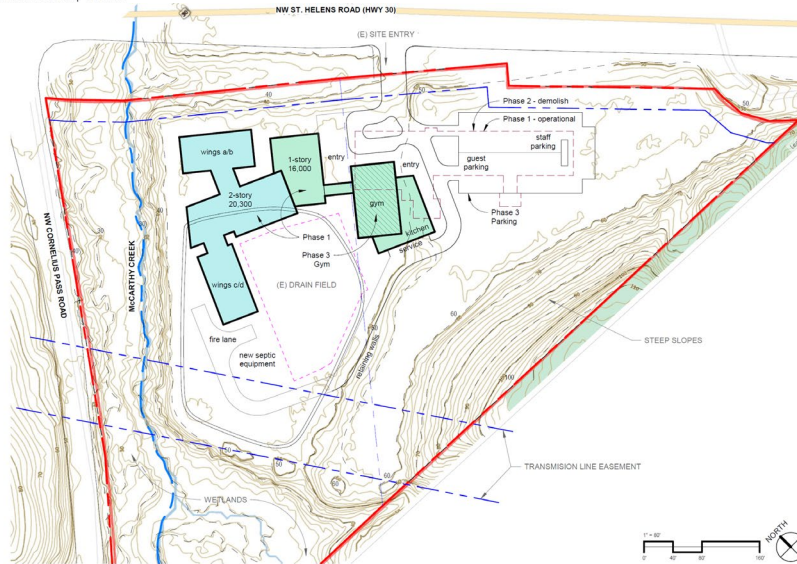
B: Gym/kitchen demolished for all or a portion of construction period

C: Maintain full NARA operations onsite during construction



MA Concept Site Plan
NARA NW Adult Residential Treatment Facility
NARA Northwest | 10/26/23

Exhibit B



MA Concept Site Plan
NARA NW Adult Residential Treatment Facility
NARA Northwest | 10/26/23

Exhibit C

NARA NW – PRELIMINARY SITE DEVELOPMENT EVALUATION OVERVIEW
08 NOVEMBER 2023

Next Steps – Design & Construction

The purpose of this assessment has been to identify the “high level” considerations affecting the feasibility of developing a replacement facility on NARA’s current property and the associated operational impacts. Recommended next steps include:

- Work with NARA to refine building and site program priorities
- Review phasing options and construction costs once contractor is engaged
- Identify preferred site development concept

Attachments

- Project Schedule
- Feasibility Study and Concept Site Layouts Memo (MFA)
- Zoning Analysis (The Bookin Group)
- Civil and Septic System Assessment Memo (EMS)